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**ATTORNEYS FOR ROBERT L. TEMPLETON,
INDEPENDENT EXECUTOR OF THE
FRANCES E. MADDOX ESTATE, AND
ROBERT L. TEMPLETON, INDIVIDUALLY**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

IN RE

**AMERICAN HOUSING
FOUNDATION, INC.,**

Debtor

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Case No. 09-20232-rlj-11

**OBJECTION OF ROBERT L. TEMPLETON, EXECUTOR OF THE
FRANCES E. MADDOX ESTATE, AND ROBERT L. TEMPLETON,
INDIVIDUALLY, TO MOTION FOR INTERIM PAYMENT ON FINAL
FEE APPLICATION OF FOCUS MANAGEMENT GROUP USA, INC.
(RE: DOCKET 2684)**

TO THE HONORABLE ROBERT L. JONES, U.S. BANKRUPTCY JUDGE:

Robert L. Templeton, Independent Executor of the Frances E. Maddox Estate and Robert L. Templeton individually (together, "Templeton") file the following objection (the "Objection") to the *Motion For Interim Payment on Final Fee Application of Focus Management Group USA, Inc.* (Docket No. 2684) (the "Motion") and filed herein by Walter O'Cheskey, the Liquidating Trustee ("O'Cheskey" or the "Trustee") and in support of such objection Templeton would show the following.

1. The Court should not enter an interim order allowing additional pre-Effective Date fees of Focus, even if the lack of an interim order on the final fee application of Focus so

far is a clerical oversight. The unsecured creditors in this case, Class 15 and Class 17 alike, simply cannot withstand the further dissipation of the insurance proceeds in the Liquidating Trust by further payment of fees for the professionals of the Chapter 11 Trustee and/or Liquidating Trustee.

2. Gardere, Tarbox, and Focus are draining the estate at an astonishing rate. Through April, 2011, the combined fees for Gardere, Tarbox, and Focus for the entire case to date exceed \$4.5 million. See Exhibit A, attached hereto and incorporated by reference herein. Gardere's fees for May, 2011 are still unrevealed. Considering the pace of the charges, no further fees should be paid whatsoever pending the conclusion of the litigation that is the primary source of the fees sought by the professionals and a determination whether any amounts paid Gardere, Focus, and Tarbox must be disgorged.

3. Is it is clear that the total professional fees to be sought in this case is on track to top \$9 million at the present rate and taking into consideration the tasks defined by Mr. McCartin for the Liquidating Trust and the genuine tasks of this case which remain unfulfilled.

4. At a minimum, the Court should delay the decision whether to enter an interim order on the final fee application of Focus until the Court next takes up the fees issue on July 14, 2011.

5. The Court also should be made aware at this point that the post-Effective Date fees sought by Gardere from the Liquidating Trustee include more than \$100,000 in charges for defending Gardere's pre-Effective Date fee applications. The defense of the fee applications should have been included with, and then allowed by the Court in conjunction with, the pre-Effective Date final fee applications, and not as current charges that Gardere attempts to assess against the Liquidating Trust.

WHEREFORE, Robert L. Templeton, Independent Executor of the Frances E. Maddox Estate and Robert L. Templeton, individually, respectfully request that the Court deny the Motion. Templeton requests such other and further relief to which he is entitled at law or in equity.

Dated: June 7, 2011

Respectfully submitted,

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By: /s/ John H. Lovell
John H. Lovell

- and -

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ATTORNEYS FOR ROBERT L. TEMPLETON,
INDEPENDENT EXECUTOR OF THE FRANCES E.
MADDOX ESTATE AND ROBERT L. TEMPLETON
INDIVIDUALLY

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was mailed by regular first class mail, postage prepaid and/or sent via ECF on June 7, 2011 to the following listed parties in interest:

Steve A. McCartin
Dan Scott
Barry Golden
Gardere Wynne Sewell LLP
1601 Elm Street, Suite 3000
Dallas, Texas 75201

Max R. Tarbox
Tarbox Law, P.C.
2301 Broadway
Lubbock, Texas 79401

Walter O'Cheskey
P. O. Box 64456
Lubbock, Texas 79464

U. S. Trustee
1100 Commerce, Room 976
Dallas, Texas 75242

/s/ Jeff Carruth
One of Counsel

EXHIBIT A

FEES OF TRUSTEE'S PRIMARY PROFESSIONALS														
	2010								2011					
	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	April	TOTAL	
Gardere	\$125,524.17	\$201,284.13	\$218,719.61	\$243,613.00	\$289,993.74	\$307,229.74	\$431,998.18	\$194,532.40	\$239,214.29	\$246,908.64	\$262,572.00	\$459,401.90	\$3,220,991.80	
Tarbox	\$41,807.01	\$28,933.88	\$25,063.66	\$24,442.28	\$28,227.68	\$24,807.38	\$23,717.99	\$26,142.49	\$13,463.21	\$13,463.21	\$48,558.21	\$17,074.17	\$315,701.16	
Focus	\$114,463.13	\$114,463.13	\$114,463.13	\$171,174.80	\$171,174.80	\$106,149.60	\$106,149.60	\$106,149.60	\$6,811.00	\$25,664.03	\$22,132.50	\$125,600.86	\$1,184,396.18	
Month Total	\$281,794.31	\$344,681.14	\$358,246.40	\$439,230.08	\$489,396.22	\$438,186.72	\$561,865.77	\$326,824.49	\$259,488.50	\$286,035.88	\$333,262.71	\$602,076.93	\$4,721,089.14	
Total through Effective Date								\$3,240,225.13		Total through 4/30/2011			\$4,721,089.14	
Total post-Effective Date												\$1,480,864.01		
Average Per Month (Entire Case)												\$393,424.10		

Note 1 The May-December 2010 totals for Tarbox Law, P.C. are derived from the spreadsheet of time entries provided by Mr. Tarbox. The January-February, 2011 statement was combined, and the total has been equally divided between the two months.

Note 2 For Focus Management, only three fee statements were provided pre-Effective Date, which fee statements covered May-July, 2010, August-September, 2010, and October-December, 2010. The numbers appears hear are the average monthly amounts per fee statement.